

Tax Controversy and Audit: The Impact of the New LB&I Campaign Strategy on the Oil and Gas Sector

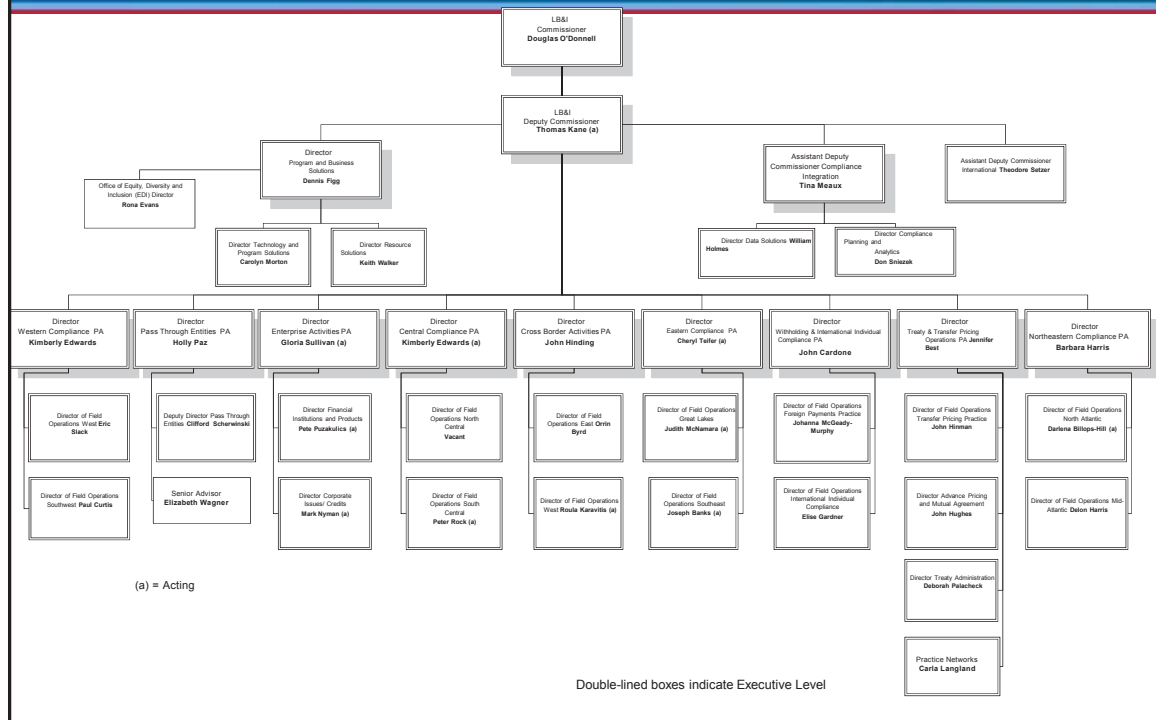
14th Biennial Parker C. Fielder Oil and Gas Tax Conference
November 2017



Introductions

- ❖ Moderator:
Richard A. Hussein, Baker Botts L.L.P. - Houston, TX
- ❖ Panelists:
Mickey G. Culpepper, Baker Hughes, a GE Company - Houston, TX
Kimberly A. Edwards, Internal Revenue Service - Oakland, CA
Peter A. Lowy, Chamberlain, Hrdlicka, White, Williams & Aughtry - Houston, TX
Kathryn F. Patterson, Office of Chief Counsel, Internal Revenue Service - Houston, TX

LB&I Organizational Chart



LB&I Environment

- ❖ Since standup (2000), the number of LB&I returns filed has increased about 70% (about 150,000 at standup to an estimated 254,700 in 2013)
- ❖ Diminished workforce. LB&I workforce is down significantly since standup.

LB&I Environment

- ❖ A top LB&I priority is our issue management strategy – finding ways to resolve issues of controversy more efficiently and sooner in the audit process
- ❖ We're continuously working to improve both the timeliness and optimum cycle time – or examination duration - of our audits.

LB&I Campaigns

- ❖ Fundamental part of LB&I's Future State
- ❖ Involve LB&I harnessing the combined intellect of our team to make intentional decisions about compliance risks
- ❖ Our decisions impact the most important resource we have – our people.

Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the [UT Law CLE eLibrary \(utcle.org/elibrary\)](http://utcle.org/elibrary)

Title search: Tax Controversy and Audit: The Impact of the New LB&I Campaign Strategy on the Oil and Gas Sector

Also available as part of the eCourse

[2017 Biennial Parker C. Fielder Oil and Gas Tax eConference](#)

First appeared as part of the conference materials for the

14th Biennial Parker C. Fielder Oil and Gas Tax Conference session

"Tax Controversy and Audit: The Impact of the New LB&I Campaign Strategy on the Oil and Gas Sector"